

BRACEWELL

February 26, 2021

VIA ECF

Magistrate Judge Judith C. McCarthy
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

Re: In re Extradition of Hyuk Kee Yoo, No. 20 Mag. 2252

Dear Judge McCarthy:

Attached to this letter is a list of the exhibits that we intend to offer into evidence at Wednesday's hearing in this matter. The Court and the government are in possession of all of these items, and so we do not intend to re-present them unless the Court wishes it otherwise. We do not intend to call any witnesses at the hearing.

Respectfully submitted,

/s/ Paul Shechtman

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Partner

PS/wr
Attachment

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KEITH YOO EXHIBITS

1. Affidavit of Professor Sang Hoon Han dated September 23, 2020. This document was filed as Appendix A to the Memorandum in Support of Motion to Dismiss South Korea's Request to Certify Yoo Hyuk Kee ("Keith Yoo") as Extraditable (ECF No. 18-1).

2. Affidavit of Jong-Min Jeon dated December 16, 2020. This document was filed as Exhibit 1 to the Reply Memorandum in Support of Motion to Dismiss South Korea's Request to Certify Keith Yoo as Extraditable (ECF No. 30-1).

3. 2012 Moreal Design Inc. Income Statement and 2013 Moreal Design Inc. Income Statement. These documents were filed as Exhibit 2 to the Reply Memorandum in Support of Motion to Dismiss South Korea's Request to Certify Keith Yoo as Extraditable (ECF No. 30-2).

4. Naeclear Asset Transfer Agreement dated March 8, 2012. This document was filed as Exhibit 3 to the Reply Memorandum in Support of Motion to Dismiss South Korea's Request to Certify Keith Yoo as Extraditable (ECF No. 30-3).

5. Excerpted Transcript of Lee Seong-Hwan dated May 3, 2014. This document was filed as Exhibit 4 to the Reply Memorandum in Support of Motion to Dismiss South Korea's Request to Certify Keith Yoo as Extraditable (ECF No. 30-4).

6. Affidavit of Professor Sang Hoon Han dated January 22, 2021. This document was filed as Exhibit 1 to Keith Yoo's Response to Government's Supplemental Submission (ECF No. 34-1).

7. Affidavit of Fran S. Yoon dated January 23, 2021. This document was filed as Exhibit 2 to Keith Yoo's Response to Government's Supplemental Submission (ECF No. 34-2).

8. The documents enclosed in the four (4) binders described below were filed as exhibits to the Memorandum in Support of Motion to Dismiss South Korea's Request to Certify Keith Yoo as Extraditable:

Korean Interviews Binder		
Tab	Date	Description
A	4/30/14	Excerpted Transcript of Kim Gyu-seok (English) and Full Transcript of Kim Gyu-seok (Korean)
B	5/6/14	Transcript of Go Chang-hwan (English and Korean)
C	5/1/14	Excerpted Transcript of Jo Seon-ae (English) and Full Transcript of Jo Seon-ae (Korean)
D	4/26/14	Transcript of Kim Chun-gyun (English and Korean)
E	5/8/14	Excerpted Transcript of Park Seung-il (English) and Full Transcript of Park Seung-il (Korean)
F	5/14/14	Excerpted Transcript of Ha Myung-hwa (English) and Full Transcript of Ha Myung-hwa (Korean)
G	5/12/14	Excerpted Transcript of Park Hwa-sun (English) and Full Transcript of Park Hwa-sun (Korean)
H	5/6/14	Excerpted Transcript of Byun Ki-choon (English) and Full Transcript of Byun Ki-choon (Korean)

Semo Documents Binder		
Tab	Date	Description
1	9/18/20	Affidavit of Kim Gyu-seok (English and Korean)
2	9/18/20	Affidavit of Jo Seon-ae (English and Korean)
3	9/18/20	Affidavit of Hwang Ho-eun (English and Korean)
4	9/28/20	Affidavit of Geun-ha Ryu (English and Korean)

5		Key Solutions report: “Business Strategies - Semo Management Consulting Report.”
6		Key Solutions report: “US-FDA Semo Facility Inspection -- Guidelines on FSMA Inspection of Semo Inc. Facilities.”
7		Key Solutions report: “HACCP: HAZARD ANALYSIS AND CRITICAL CONTROL POINT.”
8		“Consulting Schedule Management Table for SEMO CO., LTD.”
9	1/10/12	“Meeting minutes - Facility Inspection of SEMO CO., LTD. by the FDA (US Food and Drug Administration)”
10	1/19/12	“Meeting minutes - Facility Inspection of SEMO CO., LTD. by the FDA (US Food and Drug Administration)”
11	2/22/12	“Meeting minutes - Facility Inspection of SEMO CO., LTD. by the FDA (US Food and Drug Administration)”
12	3/8/12	“Meeting minutes - Facility Inspection of SEMO CO., LTD. by the FDA (US Food and Drug Administration)”
13	3/15/12	“Meeting minutes - Facility Inspection of SEMO CO., LTD. by the FDA (US Food and Drug Administration)”
14	3/30/12	“Meeting minutes - Facility Inspection of SEMO CO., LTD. by the FDA (US Food and Drug Administration)”
15	4/2/12	“Meeting minutes - Facility Inspection of SEMO CO., LTD. by the FDA (US Food and Drug Administration)”
16	4/9/12 – 4/10/12	“Minutes of the SEMO CO., LTD. inspection by the FDA”
17	4/13/12	“Meeting minutes - Facility Inspection of SEMO CO., LTD. by the FDA (US Food and Drug Administration)”
18	10/26/12	“Meeting minutes - Facility Inspection by FDA (US Food and Drug Administration) on SEMO CO., LTD.”
19	1/7/13	“January Regular Meeting - SEMO CO., LTD.”
20	2/2013	“February Regular Meeting - SEMO CO., LTD.”
21	3/11/13	“March Regular Meeting - SEMO CO. LTD.”
22	4/9/13	“Consulting Report for SEMO CO., LTD.”

23	5/15/13	“Consulting Report for SEMO CO., LTD.”
24	6/27/13	“Consulting Report for SEMO CO., LTD.”
25	7/10/13	“July Regular Meeting - SEMO CO., LTD.”
26	8/13/13	“August Regular Meeting - SEMO CO., LTD.”

Moreal Documents Binder		
Tab	Date	Description
1	9/18/20	Affidavit of Dr. Ha Myung-hwa (English and Korean)
2	9/18/20	Affidavit of Park Hwa-sun (English and Korean)
3	9/23/20	Affidavit of Han Yeun Ju
4		Key Solutions report: “Business Strategies: Moreal Design Co., Ltd. Consulting Report.”
5	2010	Key Solutions report: “2010 ABROAD INTERNSHIP PROGRAM - Moreal Design Co., Ltd. Consulting Report.”
6	2011	Key Solutions report: “2011 ABROAD INTERNSHIP PROGRAM - Moreal Design Co., Ltd. Consulting Report.”
7	2012	Key Solutions report: “2012 ABROAD INTERNSHIP PROGRAM - Moreal Design Co., Ltd. Consulting Report.”
8	2013	Key Solutions report: “2013 ABROAD INTERNSHIP PROGRAM - Moreal Design Co., Ltd. Consulting Report.”

Other Companies' Documents Binder		
Tab	Date	Description
Ahae Co. Documents		
1		Ahae Co. corporate registration and trademark registration documents
2	5/1/01	“Special Use Rights Establishment Contract (1)” between Keith Yoo and Ahae Co.

3	3/8/09	“Special Use Rights Establishment Contract (2)” between Keith Yoo and Ahae Co.
4		“Special Use Rights Establishment Contract (3)” between Keith Yoo and Ahae Co
5		Product Photo
Onnara Documents		
6		Onnara corporate name and trademark registration documents
7		Onnara trademark registration documents
8	12/1/01	“EXCLUSIVE LICENSE SETTING CONTRACT (6)” between Keith Yoo and Onnara
9		Product and logo photos
Chonhaiji Documents		
10	9/22/20	Affidavit of Sung Min Park and attached memorandum
11	1/10/09	“Registered Trademark User Agreement (4)” between Keith Yoo and Yoo Dae gyun, on the one hand, and Chonhaiji, on the other
12		Chonhaiji corporate registration documents
13		Logo photos
14	11/5/12	Letter from The Landing School to Keith Yoo
15	1/4/13	Letter from President of The Landing School to Keith Yoo
16	11/20/11	Chonhaiji report on 2010 boat markets
17		“Yacht Design Program Final Project – The Landing School”
18		Chonhaiji report: “Ahae Business Plan”
19		Chonhaiji report: “Domestic Exhibition Hall Report”
20	5/23/14	“Appraisal of Photographs by Ahae,” by Lorraine Anne Davis, effective May 23, 2014, with Addenda A – E
21		Selected writings from bound volume <i>Ten Exhibitions</i>